



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**  
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November 28, 2016

Millennium Bulk Terminals NEPA EIS,  
c/o ICF International  
710 Second Avenue, Suite 550  
Seattle, WA 98104

**RE: Department of Fish and Wildlife Comments on the Millennium Bulk Terminals -  
Longview NEPA EIS Comments**

To Whom It May Concern:

Thank you for the opportunity to comment on the Millennium Bulk Terminals-Longview Environmental Impact Statement (EIS)- NEPA. We understand the importance of this review process and offer comments based on potential project impacts to fish and wildlife resources. WDFW is a proponent of increasing the scope of this study throughout all chapters to more adequately assess impacts going forward. We break down our specific comments into the following subject areas:

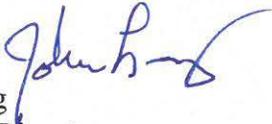
1. Increased rail traffic impacts,
2. Increased vessel traffic impacts,
3. On-site construction impacts,
4. Potential Climate Change impacts

As you know, a decision of this magnitude has many long-lasting implications for the natural resources and socio-economics of this region. WDFW works to protect and promote healthy ecosystems for the sustainable success of our statewide economy.

The Columbia River sustains major commercial and recreational fisheries of international importance, and provides many local jobs to industries that depend on its scenic, cultural, and recreational benefits. We hope you will find the attached comments helpful in informing this decision-making process.

If you have any questions about this correspondence, please contact Dave Howe at (360) 906-6729.

Sincerely,

  
John Long  
Regional Director  
Washington Department of Fish and Wildlife

### **Increased Rail Traffic Impacts**

We thank the applicant for the rail traffic and coal transport analysis. The study concludes that at full buildout in 2028, the project proposes to increase rail traffic by a total of 16 trains/ day. The analysis includes construction-related rail use as well, which assumes 467 trains for all of the first construction year (2018). Over the entirety of the construction, approx. 700 total trains, comprised of 100 cars each, would be needed for project completion.

The analysis discusses capacity on both the Reynolds Lead and the BNSF Spur, and references the Cowlitz River Bridge on the BNSF Spur. The bridge analysis states, "...the bridge opens every 4-5 years to allow passage of river-dredging vessels". This assumes that sediment accumulation remains static and/or that the U.S. Army Corps of Engineers (USACE) relies solely on raising the sediment retention structure (SRS). To this point, the USACE states, "the sediment budget is 'highly variable' from year to year", and that dredging is a component of the Adaptive Sediment Management Plan.

The analysis concludes that the added rail traffic does not currently exceed capacity, and that the additional future traffic would not exceed capacity on the Reynolds Lead and the BNSF Spur. There are inconsistencies in this analysis, such that the Port of Longview (POL) Master Plan, the Millennium DEIS and this analysis do not agree on the current and projected Reynolds Lead and BNSF Spur capacities.

Combined, the small scope, superficial discussion of cumulative impacts, and minimal discussion for necessary rail improvements outside the study area, it is difficult to truly assess the project-related rail impacts. With a stated increase of rail traffic, averaging 16 trains (100 cars long)/ day during operation, it is projected that increased wildlife strikes will occur throughout the entire affected rail corridor. We recommend a more comprehensive study of rail impacts related to the project. Additionally, a mitigation strategy should be discussed in this section and should include robust language, as well as detail regarding mitigation that addresses avoidance, minimization, and compensatory mitigation as necessary. WDFW is available for consult on mitigation strategies appropriate for the proposed actions.

### **Increased Vessel Traffic Impacts**

Vessel traffic impacts are a significant portion of the proposed project activity, and subsequently have a large potential impact on aquatic species. We would like to thank the applicant for the thorough impact assessment for construction and operation impacts to aquatic species at the project site.

We agree that scope of the increased vessel traffic is reasonable as it relates to fish with one notable exception. We propose adding that impacts to fish are not restricted to those stocks in the study area; rather, impacts should be considered for all stocks in the Columbia River Basin. This is due to a ship traffic increase of an average 70 vessels per month to the Columbia River Basin, with project related vessels occupying berths for Docks 2 and 3 for an expected 365 days per year. The potential impacts of these actions should be weighed in the study of vessel traffic impacts, and proper mitigation plans should be made.

To properly assess impacts due to increased vessel traffic related to site operation, the agency recommends additional discussion and analysis on several topics. Due to the environmental, social, recreational and economic impacts that vessel traffic could have on the region's aquatic species, the agency recommends additional analysis, as well as discussion of minimization and avoidance, on wake stranding of fish (juvenile salmonids and other species), and the impact of the daily number of ships on-site berthed and anchored. Additional impacts to fisheries in the proximate area should be analyzed, including commercial mainstem and off-channel Select Area Fishery Enhancement sites, and recreational fisheries. Recreational fisheries, including but not limited to: crabbing, mainstem salmon fisheries and the Buoy 10 fishery, should be examined within the scope of this project study. Expansion of the study area will allow for a more productive conversation on cumulative impacts to species and their habitats, as well as appropriate mitigation strategies for proposed actions.

### **Onsite Construction Impacts**

We would like to thank the applicant for the thorough impact assessment for construction and operation impacts to aquatic species at the project site. Section 4.7.5.1 explains project-related activities that may result in a direct or indirect impact to aquatic species. There are several topics that the agency recommends additional discussion on.

The Fish Fact Sheet (pg.2) underplays the loss of available habitat by the destruction of 24 acres of productive wetland and 26 acres of upland vegetation on the project site, which is home to a diverse host of species and ecological communities important to the area and region. This includes the great pacific flyway, a corridor for migrating birds. Analysis on the impacts above and beyond avoidance and minimization is requested in order to effectively discuss mitigation needs for the impacts to species and environments from on-site construction.

Relating to proposed dredging, please provide additional clarification for the siting of this facility as the scope of the siting study was unclear. Per WAC 220-660-160(3), information regarding the location, design and construction of new marinas and terminals should be discussed in more detail. In addition, WDFW recommends appropriate mitigation for new dredging be included in on-site construction scoping, as it relates to WAC 220-660-160.

Previous dredging activities throughout the lower Columbia River are providing further insight on both short- and long-term impacts to aquatic environments and species. For example, through time in-water disposal for clean material has become the preferred method as expressed by the agency. Topics such as initial dredging, maintenance dredging intervals and quantities, as well as a study on slope stability in regards to regrade and potential expansion of the dredge area are important pieces in the determination of impacts and appropriate mitigation. We request more information on the topics of dredging on-site and its larger cumulative impacts on the Lower Columbia River in the formation of a mitigation package. The department offers consultation on the determination of appropriate mitigation and best management practices such as hydraulic dredge operation.

There are several work windows discussed in this document. An improved, concise in-water work window for construction can minimize on-site impacts. Section 8.2.7 states an in-water work window of December-May, while Section 5.7.2.1 states August 1-February 28<sup>th</sup>. Further clarification on which activities are proposed during each work window is encouraged to more accurately assess impacts and mitigation activities. In addition, please provide justification for dredging in August and September. Section 5.7.2.1 states: “dredging, including flow lane disposal of dredged material, would be performed between August 1 and December 31; and impact pile-driving between September 1 and December 31.” It is largely accepted that the Columbia River In-water Work Window (CRIWWW) is October 1 through December 31, and any deviation from this window should be well justified and mitigated for. The agency requests discussion on setting the in-water work window, and offers consultation on this topic as the project staging continues. In addition, we support the removal of creosoted pilings by vibratory hammer as proposed.

The department defines mitigation as sequentially avoiding impacts, minimizing, and rectifying unavoidable impacts, and compensating for remaining impacts. Section 8.2.7 addresses the preparation of a compensatory mitigation plan in coordination with local, state and federal agencies but fails to mention WDFW as one of those partners. Our agency is hopeful that we can engage the applicant in discussion on compensatory mitigation to meet the needs of WAC 220-660-080 (4), which discusses working with applicants to reach a mitigation plan that provides equal or better habitat functions, value and quantity by habitat type. In addition, WDFW is open to creative compensatory mitigation approaches, including an in-lieu fee program as a portion of the mitigation package.

### **Increased Climate Impacts**

Section 6.8, “Greenhouse Gas Emissions” is temporally limited (20 years) as well as spatially limited (export terminal only) and describes projected impacts from climate change. WDFW recommends including a more robust discussion of the impacts climate change will have on the fish and wildlife of Washington, as well as the important economic value it serves our state and region. Climate impacts are expected to affect ecosystems, species and habitats in at least six key ways. These include the degradation and loss of habitat, increase in major ecosystem disturbances, shifts in geographical ranges of some native plants and animals, change in timing of life history events for species, declines in species population and the loss of biodiversity, and the spread of invasive species and disease. These impacts have large ramifications for our region’s social, economic and environmental viability in the future. WDFW suggests referencing [“State of Knowledge Report: Climate Change Impacts and Adaptation in Puget Sound”](#), prepared by the Climate Impacts Group in 2016 in further analysis of this topic and the discussion appropriate mitigation for project impacts.